

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

CASE NO. 1:23-cv-24079-FAM/TORRES

RIGI KOPF, LLC, a Florida limited liability Company,

Plaintiff,

v.

SKYBRIDGE MIAMI, LLC, a Delaware Limited Liability Company, FELIPE MONROY TORRES, individually, ARIEL ZEEV PICKER SCHATZ, individually, BOBE HOLDINGS LIMITED PARTNERSHIP, a Prince Edward Island (Canada) Limited Partnership, and OLGA SCHATZ SKVIRSKY, individually,

Defendants.

JOINT NOTICE OF SETTLEMENT

Plaintiff, RIGI KOPF, LLC, a Florida limited liability Company, and Defendants, SKYBRIDGE MIAMI, LLC, a Delaware Limited Liability Company, FELIPE MONROY TORRES, individually, ARIEL ZEEV PICKER SCHATZ, individually, BOBE HOLDINGS LIMITED PARTNERSHIP, a Prince Edward Island (Canada) Limited Partnership, and OLGA SCHATZ SKVIRSKY, individually (collectively, the “Defendants”), by and through their respective undersigned counsel, file this Joint Notice of Settlement, pursuant to Local Rule 16.4.

1. On September 25, 2024, the parties reached an agreement in principle to resolve all of Plaintiff’s claims against all Defendants.

2. The parties are in the process of drafting the settlement agreement and will file a Stipulation of Dismissal pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), once finalized.

3. Accordingly, the parties jointly and respectfully request that all pending discovery, pleading, and pretrial deadlines should be vacated.

4. The parties further request that the Court reserve jurisdiction to enforce the terms of the settlement agreement.

DATED on this 26th day of September, 2024.

MSP RECOVERY LAW FIRM
The Miami Green Building
3150 Southwest 38th Avenue, 11th Floor
Miami, Florida 33146
Telephone: (305) 614-2222

By: Christine M. Lugo
JOHN H. RUIZ
Florida Bar No. 928150
jruiz@msprecoverylawfirm.com
CHRISTINE M. LUGO
Florida Bar No. 109515
clugo@msprecoverylawfirm.com
serve@msprecoverylawfirm.com
JANPAUL PORTAL
Florida Bar No. 0567264
jportal@msprecoverylawfirm.com

Respectfully submitted,

GREENBURG TRAURIG, P.A.
333 S.E. 2nd Avenue, Suite 4400
Miami, Florida 33131
Telephone: (305) 579-0500
Facsimile: (305) 579-0717

By: /s/ Michael N. Kreitzer
MICHAEL N. KREITZER
Florida Bar No. 705561
kreitzerm@gtlaw.com
moisem@gtlaw.com
fbservice@gtlaw.com
JENNIFER JUNGER
Florida Bar No. 125853
jungerj@gtlaw.com
fernandezfe@gtlaw.com
PHILLIP M. SOVEN
Florida Bar No. 1035504
phil.soven@gtlaw.com
moisem@gtlaw.com